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*Attorneys for Plaintiff, McDonald's Corporation*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

## MCDONALD'S CORPORATION

Case No.: 2:23-cv-00384-JCM-EJY

Plaintiff.

VS

CIRCA HOSPITALITY GROUP II LLC D/B/A  
THE D LAS VEGAS

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
SUBMITTING DISCOVERY  
PLAN/SCHEDULING ORDER**

Defendant

(FOURTH REQUEST)

Plaintiff, McDonald's Corporation ("McDonald's") and Defendant Circa Hospitality Group II LLC d/b/a The D Las Vegas ("The D" and together with McDonald's, hereafter as the

1 "Parties"), by and through their undersigned counsels of record, jointly submit this stipulation:

2 WHEREAS:

- 3 1. On March 17, 2023, McDonald's filed its operative pleading, the Amended
- 4 Complaint [ECF No. 8];
- 5 2. On March 27, 2023, The D filed its Motion to Dismiss Plaintiff's Amended
- 6 Complaint [ECF No. 22];
- 7 3. Deadline for the Parties to submit their proposed Discovery Plan/Scheduling Order
- 8 was previously extended from June 26, 2023 to July 26, 2023 [ECF No. 40];
- 9 4. As previously reported, the Parties have agreed to a meeting involving their
- 10 respective management to finalize settlement discussion initiated through multiple
- 11 correspondences detailing circumstances surrounding the alleged defaults, related
- 12 investigations, remedial measures taken and proposing a path forward in their
- 13 continuing business relations. The Parties have worked diligently to coordinate the
- 14 availability of the prospective attendees, and have agreed to set July 26, 2023 as
- 15 the meeting date.

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1           NOW THEREFORE, the parties stipulate and agree that the current deadline of July 26,  
2 2023 shall be extended up to and including August 25, 2023 for the parties to submit a Discovery  
3 Plan/Scheduling Order. This is the parties' fourth request for an extension of this deadline, and is  
4 not submitted to cause any undue delay or prejudice.

5           **IT IS SO STIPULATED.**

6           DATED this 24th day of July, 2023.

7           DICKENSON WRIGHT PLLC

8           /s/ *Kerry E. Kleiman*

9           Cynthia L. Alexander, Esq.  
10           Nevada Bar No. 6718  
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15           *Attorneys for Defendant, Circa  
16           Hospitality Group II LLC d/b/a The D  
17           Las Vegas*

18           DATED this 24th day of July, 2023.

19           WRIGHT, FINLAY & ZAK, LLP

20           /s/ *Yanxiong Li*

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36           *Attorneys for Plaintiff McDonald's Corporation*

37           **IT IS SO ORDERED.**

38           Dated this 24th day of July, 2023.

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41           UNITED STATES MAGISTRATE JUDGE